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November 21, 2024

Hon. Leonard P. Stark
United States District Court
District of Delaware
844 King Street
Wilmington, Delaware 19801

RE: *Crystallex International Corp. v. Bolivarian Rep. of Venezuela*, No. 1:17-mc-00151-LPS

Dear Judge Stark:

On behalf of our client, Rusoro Mining Ltd., as well as Additional Judgment Creditors Gold Reserve Inc., and ACL1 Investments Ltd., ACL2 Investments Ltd., and LDO (Cayman) XVIII Ltd. (collectively, “ACL”) (and the foregoing Additional Judgment Creditors, the “Objecting Parties”), we write to respectfully inform the Court that the Objecting Parties object to the entry of a proposed order approving the fees set forth in the Special Master’s report for the month of September 2024. D.I. 1430; D.I. 1432.

The Special Master’s fees have increased by a staggering amount over the past several months. For example, in the September report, the invoice of the law firm of Weil, Gotshal & Manges LLP included 74 timekeepers, across six geographic locations, billing a total of 2,483.90 hours for a total of \$3,568,390.50 in fees. As the Sale Process approaches a critical phase, it is likely that substantial additional fees have been generated in October and November and will be generated in future months. In these circumstances, given the amount of fees incurred for prior periods and the current status of the Sale Process, the Objecting Parties feel compelled to object to the fees incurred during the month of September.

We, therefore, propose the following briefing schedule, which tracks the dates of the schedule set by the Court for the pre-December 13, 2024 hearing submissions: three-page letter briefs addressing objections to the Special Master’s September fees due November 26, 2024, three-page responsive letter briefs due on December 3, 2024 and two-page reply briefs be due on December 6, 2024.

Respectfully submitted,

R. Craig Martin

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cc: Counsel of Record (via ECF)